

EXHIBIT D

Issued by the

UNITED STATES DISTRICT COURT

Middle

DISTRICT OF

Pennsylvania

TAMMY KITZMILLER

SUBPOENA IN A CIVIL CASE

V.

DOVER AREA SCHOOL DISTRICT; DOVER AREA
SCHOOL DISTRICT BOARD OF DIRECTORSCase Number:¹

04-CV-2688 (M.D. Pa.)

TO: York Dispatch
205 N. George St.
York, PA 17401

- ☐
- YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐
- YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒
- YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or place, date, and time specified below (list documents or objects):

See Attached Exhibit A

PLACE

Dover Area School District; 2 School Lane; Dover, Pennsylvania 17315

DATE AND TIME

June 7, 2005 at 9:00 a.m.

- ☐
- YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR
Attorney for Defendants

DATE

May 24, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Patrick T. Gillen, 24 Frank Lloyd Wright Drive, P.O. Box 393, Ann Arbor, MI 48106, (734) 827-2001

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Exhibit A to Bernhard-Bubb and York Dispatch Subpoenas.

1. All drafts of any story written by Heidi Bernhard-Bubb relating to the Dover Area School District, its officers, school board, school board members, administration, employees, or staff (referred to collectively herein as "DASD") or its schools from June 1, 2002 to the present.
2. Any document relating to any work by editorial staff relating to work of Heidi Bernhard-Bubb relating to DASD from June 1, 2002 to the present, including but not limited editorial to comments upon, and/or revisions or changes to, such work.
3. All notes, writings, or work-product of any kind relating in any way to any story written by Heidi Bernhard-Bubb relating to DASD or its schools from June 1, 2002 to the present.
4. All communications from, by, or to, officers, staff, agents, and employees of the York Daily Record and Heidi Bernhard-Bubb the accuracy and reliability of her work.
5. All communications to Bernhard-Bubb or the York Dispatch relating to any complaints about Heidi Bernhard-Bubb's work.
6. Any job performance review of any kind concerning Heidi Bernhard-Bubb.
7. Any communications by Bernhard-Bubb relating to Bill Buckingham, Alan Bonsell, Sheila Harkins, Heather Geesey, Jane Cleaver, Casey Brown, Jeff Brown, Noel Wenrich, Angie Yingling and other board members who have joined the board since September of 2004.
8. Any communications between Heidi Bernhard-Bubb and any person relating to DASD, Dover CARES, or candidates running under the banner of DOVER CARES from January 1, 2004 to the present.
9. Any communications from or to Heidi Bernhard-Bubb relating to the outcome of any primary or general election relating to the DASD from January 1, 2005 to the present.